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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

DEFENDANTS LISTED ON EXHIBIT A
ATTACHED HERETO,

Defendants.

Adv. Pro. Nos. Listed on Exhibit A

STIPULATION EXTENDING TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which defendants identified in Exhibit A (“Defendants”) may move, answer, or otherwise respond to the Complaint filed in the above-captioned adversary proceeding is extended up to and including May 31, 2013.

The purpose of this stipulated extension is to provide additional time for Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this Stipulation is a waiver of the Defendants’ right to request from this Court a further extension of time to answer, move, or otherwise respond and/or the Trustee’s right to object to any such request.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

Undersigned counsel for the Defendants: (i) expressly represents that, in accordance with Rule 25(a) of the Federal Rules of Civil Procedure, a statement noting the death of any and all Defendants known by counsel to be deceased has been served upon the Trustee, and (ii) expressly agrees to notify the Trustee of the death of any Defendant(s) within five business days of the date upon which counsel first learns of the passing of such Defendant(s).

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed an original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences (ECF No. 5158) in the above captioned (No. 10-04470, 10-04472, 10-05372 (BRL)).

Dated: April 10, 2013

BAKER & HOSTETLER LLP

By: /s/ Marc E. Hirschfield

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*Attorneys for Defendants Identified in
Exhibit A Attached Hereto*

EXHIBIT A

Adversary Proceeding Number	Named Defendants
10-04470	The Silna Family Intervivos Trust, Ozzie Silna, in his individual capacity and as trustee for the Silna Family Intervivos Trust, Spencer A. Silna, Samantha R. Silna, and Sophie H. Silna.
10-04472	White Lake Associates, Daniel Silna, Joan Silna, Amy Silna Shafron Trust, Noah Shafron, Ezra Shafron Trust, Tracy Silna Zur, Coby Zur Trust, Kayla Zur Trust, Logan Zur Trust, Guy Colaneri, and Carol Colaneri.
10-05372	O.D.D. Investment, L.P., D.D.O., Inc., Daniel N. Silna, Ozzie Silna, Donald Schupak, The Robin Silna 1997 Trust, Robin Silna, The Jeffrey Silna 1997 Trust, Jeffrey Silna, The Silna Family Inter Vivos Trust, Spencer Silna, Samantha Silna, and Sophie Silna.